

**OFFICE OF THE STANDING CHAPTER 13 TRUSTEE
6851 N.E. Loop 820, Suite 300
North Richland Hills, TX 76180-6608
(817) 770-8500
Fax (817) 770-8511**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

JUDITH ELLEN JONES ROTZOLL

Debtor,

Case No: 21-41253-MXM

Court Hearing:

**Time & Date: 8:30 AM on
Thursday, August 19, 2021**

TRUSTEE'S OBJECTION TO CONFIRMATION

TO THE HONORABLE MARK X MULLIN, U.S. BANKRUPTCY JUDGE:

Now comes Tim Truman, the Standing Chapter 13 Trustee, and files this his "Trustee's Objection to Confirmation" of the Plan heretofore filed herein by Debtor, and for the same would respectfully show the Court as follows:

The Debtor has failed to meet the requirements of 11 U.S.C. Section 1325(a)(1). The Trustee would show that the Debtor has not provided to the Trustee their most recent federal income tax return as required by Section 521(e)(2)(A)(i). As of the date of the 341 meeting on July 21, 2021, the federal income tax return for the following tax year had not been provided to the Trustee: **2020**. Therefore, the Trustee is unable to recommend Confirmation of the Plan.

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that said Plan not be confirmed unless and until it has been modified to cure all objections set forth hereinabove, and for general relief.

Respectfully submitted,

By: /s/ Angela D. Allen

Tim Truman, Bar # 20258000
Standing Chapter 13 Trustee
Angela Allen, Bar #
007869700
Staff Attorney

21-41253-MXM JUDITH ELLEN JONES ROTZOLL

Trustee's Objection to Confirmation

Page 2

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing "Trustee's Objection to Confirmation" was served on all parties listed below in the manner listed below on or before July 22, 2021.

/s/ Angela D. Allen

Tim Truman, Angela Allen

BY FIRST CLASS MAIL:

JUDITH ELLEN JONES ROTZOLL, 109 DEER CROSSING WAY, AZLE, TX 76020-0000

BY ELECTRONIC SERVICE:

ALICE BOWER, 6421 CAMP BOWIE BLVD STE 300, FORT WORTH, TX 76116

LINEBARGER GOGGAN BLAIR & SAMPSON LLP, 2777 N STEMMONS FWY #1000, DALLAS, TX 75207

United States Trustee, 1100 COMMERCE STREET, ROOM 976, DALLAS, TX 75242